

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 Meta Platforms, Inc (Instagram) Subject Accounts,
 more fully described in Attachment A

Case No. MJ22-104

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SUBJECT ACCOUNTS, more fully described in Attachment A, incorporated herein by reference.

located in the _____ Nothorn _____ District of _____ California _____, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. §§ 1591
 18 U.S.C. § 2422
 18 U.S.C. § 2423

Sex trafficking of children or through force, fraud, and coercion.
 Attempted enticement of a minor.
 Attempted transportation of minors with the intent to engage in prostitution.

The application is based on these facts:

- ☒ See Affidavit of FBI Special Agent Robert Spivey, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.



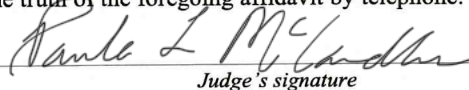
Applicant's signature

Robert Spivey, FBI Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/17/2022



Judge's signature

City and state: Seattle, Washington

Paula L. McCandlis, United States Magistrate Judge

Printed name and title

Assisting in this investigation is online undercover Task Force Officer (TFO) Craig Tangeman. TFO Tangeman has served as a TFO with the FBI's Child Exploitation and Human Trafficking Task Force in Denver, Colorado since January 2016. TFO Tangeman is responsible for investigating cases involving human trafficking for the purpose of sexual servitude. TFO Tangeman is also an Investigator with the Arapahoe County Sheriff's Office and has been employed in the law enforcement profession for over 22 years. TFO Tangeman has received training in the areas of domestic and international sex trafficking, the commercial sexual exploitation of children, pimping, prostitution, and sexual assault investigations. TFO Tangeman has been the lead investigator in over fifty human trafficking investigations and has assisted in over one hundred additional human trafficking and prostitution-related investigations.

4. The facts set forth in this Affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; review of documents and records related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers, and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

IDENTIFICATION OF THE SUBJECT ACCOUNTS TO BE SEARCHED

5. I am submitting this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant for the following Instagram accounts:

- Account ID Instagram: <https://www.instagram.com/iketurnher>
- Account ID Instagram: <https://www.instagram.com/trinity.main>
- Account ID Instagram: <https://www.instagram.com/hoesdrivinufos>

- 1 • Account ID Instagram: <https://www.instagram.com/luh.mama02>
- 2 • Account ID Instagram: https://www.instagram.com/allison_mae_92
- 3 • Account ID Instagram: https://www.instagram.com/liltrapstar_snow

4 (hereafter referenced as “SUBJECT ACCOUNTS”). The accounts are for Instagram
5 accounts for the target of this investigation, Isaac Shorack, and victims and/or co-
6 conspirators of Shorack. Law enforcement received information regarding the above
7 account during the course of the investigation as set forth below.

8 6. The above user IDs identify Instagram accounts stored at premises owned,
9 maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), a social networking
10 company headquartered in Menlo Park, California. The information to be searched is
11 described in Attachment A. This affidavit is made in support of an application for a
12 search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require
13 Meta to disclose to the government copies of the information (including the content of
14 communications) further described in Section I of Attachment B. Upon receipt of the
15 information described in Section I of Attachment B, government-authorized persons will
16 review that information to locate the items described in Section II of Attachment B.

17 7. As discussed below, there is probable cause to believe that Shorack, as well
18 as victims and/or co-conspirators of Shorack, used the SUBJECT ACCOUNTS. In
19 addition, as further explained below, there is probable cause to believe that Shorack has
20 violated Title 18, United States Code, Section 1591(a)(1) and (b)(1) (Attempted Sex
21 Trafficking of a Minor); Title 18, United States Code Section 2422(b) (Attempted
22 Enticement of a Minor); Title 18, United States Code, Section 2423(a) (Attempted
23 Transportation of a Minor with Intent to Engage in Prostitution); and Title 18, United States
24 Code, Section 2421 (Transportation for the Purpose of Prostitution), and that the SUBJECT
25 ACCOUNTS will contain evidence, instrumentalities, contraband, and fruits of violations
26 of these listed offenses, which are described in Attachment B.

27 8. This Affidavit is being presented electronically pursuant to Local Criminal
28 Rule CrR 41(d)(3).

JURISDICTION

9. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).]

SUMMARY OF PROBABLE CAUSE

A. Background of Investigation

10. On November 15, 2021, the FBI received a tip from the National Human Trafficking Hotline about potential minor sex trafficking in Seattle, Washington. The information was submitted by a relative of a suspected minor sex trafficking victim with the initials L.P. (hereinafter referred to as L.P). According the reporting person, L.P. had been forced for approximately three weeks to engage in sex acts in exchange for shelter and unspecified illicit substances by an unidentified adult male trafficker who resides on a boat in Bellingham, Washington. The reporting person further stated that the unidentified male trafficker had taken L.P. to Seattle and introduced her to a different adult male trafficker and two potential minor victims, subsequently identified as M.L. and T.M. The reporting person stated that L.P. had told her that she (L.P.) was making \$1,500 a day, but did not say how she was making the money. L.P. also told the reporting person that she, M.L., and T.M. had been evicted from a home in Seattle due to high foot traffic.

11. On November 15, 2021, Supervisory Special Agent Steven Vienneau was in telephonic and e-mail contact with the reporting person. The reporting person stated that the Seattle-based trafficker had provided L.P. with an iPhone (number 360-255-1443) to use, as well as set up a bank account for L.P., M.L., and T.M. to use. The reporting person stated that the three minors were “working” a corner in Shoreline, Washington, each day starting at approximately 3:00 or 4:00 p.m. and did prostitution “dates” at the Nexus Hotel in north Seattle. The reporting person further stated that the minors had been in room 125 at the hotel from approximately August 30 to September

1 4th or 5th, before moving to an apartment. The reporting person provided several photos
2 of L.P. and the other minors (M.L. and T.M.) from L.P.'s social media account. One of
3 the photos showed two horses and the comment: "Ready to ride some horses." The photo
4 was tagged with the location "BACK COUNTRY HORSE RIDES – Long Beach, WA."
5 The reporting party e-mailed that L.P. had been at a ranch in Long Beach, Washington,
6 until November 16, 2021, and had been "in a Lamborghini." The reporting party further
7 described minor M.L. as a sixteen-year-old white female with blonde hair, blue eyes,
8 approximately five feet three inches tall and a thin build.

9 12. Upon receiving this information, the FBI contacted the Long Beach Police
10 Department (LBPD), who directed officers to respond to the Back Country Horse Rides
11 ranch to recover L.P., M.L., and T.M. or confirm that they had been there. On November
12 16, 2022, when the officers arrived, the minors were no longer there, but the ranch
13 manager, B.H., recalled having seen them after being shown pictures of the minors. B.H.
14 provided LBPD officers with a signed liability waiver that included the names and
15 signatures of individuals who had ridden horses at the ranch on November 13, 2021. The
16 signatures on the waiver included Defendant Isaac Shorack, L.P., M.L., and T.M.

17 13. B.H. was subsequently interviewed by FBI special agents on January 12,
18 2022. During that interview, B.H. stated that he recalled that the three girls were with
19 two black males. He stated that both of the males were tall, skinny, and in their early
20 twenties. He further said that one of the males appeared to be in charge and did most of
21 the talking and was "charismatic. He said that the other male was quiet. B.H. stated that
22 the group was from Seattle. He thought that they arrived in a "flashy" car, but he could
23 not recall anything specific. B.H. stated that none of the girls appeared scared and they
24 all had big smiles on their faces.

25 14. During a follow-up interview on January 13, 2022, B.H. was with J.B., a
26 wrangler who helped him the day the girls were at the ranch. B.H. stated that J.B. had
27 interacted with the group more than he had. B.H. told law enforcement that he recalled
28

1 there were four girls and only one black male in the group, and that they drove a silver or
2 dark silver Suburban.

3 **B. November 18, 2021 Recovery of L.P. and T.M. and Consent Search of Their**
4 **Cell Phones**

5 15. On November 18, 2021, L.P. and T.M. were contacted by Seattle Police
6 Department (SPD) detectives in a prostitution sting. SPD detectives confirmed that both
7 L.P. and T.M. were minors. FBI Special Agent Hippe and Supervisory Special Agent
8 Vienneau responded to the police station and contacted L.P. and T.M, who consented to a
9 search of their cell phones. SA Hippe conducted a forensic extraction of the two phones,
10 which I subsequently reviewed.

11 16. Consistent with the information provided by the reporting person, L.P.'s
12 cell phone was an iPhone with phone number 360-255-1443. T.M.'s phone was an
13 iPhone with phone number 206-747-1231. During a review of the phone extraction of
14 L.P.'s phone, I observed a group chat that included the following participants: (1) phone
15 number 206-696-4026, which was not a saved contact in L.P.'s phone but was saved
16 under the contact name "Ike" in T.M.'s phone; (2) a phone number saved under the
17 contact name "Jae"; (3) a phone number saved as a name associated with M.L.; (4) an
18 iCloud account associated with L.P.; (5) a phone number saved as a name associated with
19 T.M., which was the same number as the phone that T.M. gave the FBI consent to search
20 (206-747-1231); (6) a phone number saved as "B"; and (7) a phone number saved under
21 the contact name "Kelsie." The chat began on September 8, 2021, and ended November
22 18, 2021, the date L.P. and T.M. were recovered by law enforcement. As set forth in
23 greater detail below, the texts in the group chat indicated that "Ike" was a pimp and that
24 L.P., T.M., M.L., "Jae," "B" and "Kelsie" were engaging in commercial sex acts in the
25 north Seattle area at "Ike's" behest. L.P., T.M., M.L., and "B" appear to be actively
26 engaged in commercial sex acts for "Ike" during this entire period, while "Jae" and
27 "Kelsie" are active for only parts of this period.
28

17. The following text messages sent by Ike indicate that he was a pimp/sex trafficker directing the others in the group chat (hereinafter referred to collectively as “the victims”) to engage in commercial sex acts:

- On September 12, 2021, Ike messaged, “Let’s use this group chat for blade work purposes only.” I know through training and experience that the term “blade” refers to an area of open air prostitution. I am further aware that north Aurora Avenue in Seattle is often referred to as “the blade,” and that prostitution is very common along this stretch of road.

- In numerous messages, the victims and Ike refer to “dates” and “tricks.” I know through training and experience that in this context, these terms refer to sex buyers.

- On September 10, 2021, Ike messaged: “[M.L.] and [T.M.] Trap out the room J & [L.P.] trap out the room.” I know through training and experience that the word “trap” is often used by those engaged in the prostitution industry to refer to engaging in commercial sex.

- On September 11, 2021, Ike messaged: “Reminder that we don’t do nothing RAW! Nothing raw. What so ever. We always use condoms.” I know through training and experience that “raw” refers to sex without a condom. L.P. replied “I’ve been known that,” and Ike responded “We’ll then stop sucking dick raw.”

- On October 2, 2021, Ike messaged, “I know the cops are out, keep hoeing around them. Walk the whole blade... even if you gotta go all the way to Key bank.” I know through training and experience, “hoeing” refers to engaging in commercial sex.

- On October 19, 2021 Ike messaged, “Still disappointed no one on my team does anal,” referring to anal sex. L.P. replied, “I do tf for the right price.” M.L. messaged, “I did like 5 secs of anal today,” and Ike replied, “Stop lying [M.L.]” “B” and T.M. respond that they will not do anal sex. Ike messages: “\$500 is out [sic] anal price.”

18. Throughout the group chat Ike makes clear that his role in the organization is that of a pimp/trafficker. On September 8, 2021, Ike messaged:

Glad y’all having a good day off [heart emoji]

Reminders: We work hard play hard,

I’m not a parent, & I’m not a boyfriend.

I’m a P

With that being said, turn up, have fun, but remember when it’s time to go it’s time to go.

1 Tomorrow: [T.M.] will be there to get food for everyone in the morning
 2 We are 10 toes on the blade, by 2:30 p.m. Not a second later.
 3 We are sober enough to work and not be stupid
 4 We are focused.
 5 Whatever y'all do tonight, better not fuck up the room situations, & better
 6 not affect how we act tomorrow.
 7 Let's be respectful, professional, and locked in tomorrow [100 emoji]
 8 Big weekend ahead. A lot of moving parts, communication will be key.
 9 I'm no longer tolerating, talk back, attitude, or disrespect.
 10 Y'all know my expectations
 11 Thank you, have a good night.
 12 Let me know if you need anything.

13 I know through training and experience that traffickers often use the letter "P" and/or
 14 images of "P" to mean pimp or to refer to themselves as a pimp. In addition, based upon
 15 this training and experience, I interpreted Ike's instruction to have "10 toes on the blade,
 16 by 2:30 p.m. Not a second later" to mean that he expected the victims to be ready to walk
 17 the street in order to engage in commercial sex at that time.

18 19. Throughout the chat Ike directs victims with regards to when to report to
 19 "the blade;" where to stand on "the blade;" where to engage in commercial sex
 20 encounters, including cars and their rooms; how much to charge for commercial sex
 21 encounters, often referring to them as "dates;" how to respond if contacted by law
 22 enforcement; how to act with sex buyers, often referring to them as "tricks;" and how to
 23 act around other pimps, often using the terms "in pocket" and "out of pocket." I know
 24 through training and experience that "in pocket" in the pimping/prostitution culture refers
 25 to a victim being under a pimp's control and following his instruction.

26 20. On September 25, 2021, Ike messaged the group chat: "I'll be posted
 27 around the hotel & timing dates. In and out today No excuse." Ike went on to say:
 28 "We're down until I feel like they're ain't no more tricks to be got. Pace yourself, be
 patient with yourself! Use lube. Stick to your timers. Only contact me for P's out of line
 sweating you, emergency's with weird tricks, or if you feel like the Feds are on you.
 Other than that, have your phones on, listen for my instruction & reply in a timely

1 manner.” Based upon my training and experience, I interpreted this message to mean that
 2 Ike was instructing his victims that they were to remain on the street until he determined
 3 that they were unlikely to engage with any other sex buyers, and to follow time limits for
 4 each “date.” I also interpreted Ike to be emphasizing that the victims were only to
 5 contact him if another pimp attempted to recruit them, if they had a “weird” sex buyer, or
 6 if they believed law enforcement was present.

7 21. After sending that message, Ike sent the following text:

8 If any bitch feels like arguing with me today! Pack your shit and go home
 9 I give such clear instructions... that there should be no reason that I ! Have
 10 to clarify myself to y’all.

11 It should be “yes sir” or “I got you”

12 End of story.

13 If you have a question about the instruction . . . I can answer.

14 But I’m tired of saying something, and then someone chiming in their
 15 opinion of what they think. I DIDNT ASK!

16 22. On October 1, 2021, Ike messaged: “If anyone asks you about IKE, it’s
 17 none on there business. The answer is ‘I got folks’ ‘I’m happier than ever.’” I know
 18 through training and experience that “folks” is used in the pimping and prostitution
 19 culture to refer to pimps and the sex workers under their control. Based upon this same
 20 training and experience, I interpreted this message to be Ike telling his victims not to
 21 provide any information about him if asked, but to simply state that they had a pimp
 22 “family” and were happy.

23 23. On numerous occasions the messages indicated that Ike used physical
 24 violence to control his victims. On October 1, 2021, Ike messaged, “B got her ass beat
 25 bad. If I were y’all Id text her something sweet about how you appreciate her & look to
 26 her like and older sister and hope to see her tomorrow.” Then Ike messaged, “And say
 27 that you all have experienced my discipline.” I interpreted this text message to mean that
 28 Ike was informing his other victims that he had beat up “B,” and that the other victims
 should reach out to “B” and say that they had also been beaten up by Ike in the past.

24. On October 10, 2021, Ike messaged:

1 This week was not a good week...if I had to Grade it I would give it a D-
 2 I think what scares me the most is we like to act like we are oblivious as to
 why we are getting a poor Grade...that! Or we just like to play dumb

3 This week left me with a lot of doubt!
 4 I'm starting to question myself.
 5 Is my pimpn getting to soft?
 6 Did I get them an apartment to quick?
 7 Are they mentally strong enough to make it through the rain?
 8 Are they committed to me as much as I'm committed to them?
 9 Am I waisting my time?
 10 Do they belong on the team? Or do I scrap it all and restart...

11 And Y'all should take pride in your hoein! Take pride in representing IKE
 12 TURNHER

13 25. I interpreted this message as Ike expressing frustration with his victims for
 14 not earning him enough money, and that he was questioning whether he was being too
 15 "soft" with his victims and whether he should "restart with others." Ike also refers to
 16 himself as "IKE TURNHER" in this message. I am aware that many pimps/traffickers
 17 use a street/pimp name to refer to themselves. I also am aware that the phrase "turn her"
 18 is often used by pimps to describe recruiting a victim to engage in commercial sex for
 19 them, and that Ike Turner was a musician who is well known for his extreme physical
 20 abuse of his wife, singer Tina Turner.

21 26. On October 17, 2021, Ike messaged: "Everything for the first time in my
 22 pimp career is completely set up for you guys to achieve nothing but success . . ." Ike
 23 then messaged the group about recruiting others to work for him:

24 If y'all ever meet a bitch you want to knock, or a friend you think of
 25 who wants to join the team.

26 Y'all can show them these pics as a means to show that I'm a real P
 27 who ain't getto and a bumb.

28 Not saying we're knocking anyone!! But when the time comes to
 grow.

Use theses

1 -never use my real name

2 -never show my real ID

3 -and never imply much about your situation

4 Other than your elevating and they should come home this way and
5 touch some real money with som real pimpin

6 I am aware that the term “knock” is used by those in the pimping/prostitution culture to
7 refer to recruiting a victim to work for a pimp.

8 27. Accompanying this text message were three pictures of a black male. One
9 picture is of a black male leaning against a black car with yellow trim on the front
10 bumper that appears to be the Dodge Charger with yellow trim on the bumper, further
11 described below. A graphic of a black male wearing a crown was placed over the male’s
12 face. I know through training and experience that crowns are used in the
13 pimping/prostitution culture to represent pimps. The second photo shows a black male
14 with the same graphic covering his face in a hot tub, while the third photo shows a black
15 male in a suit. Law enforcement subsequently located identical photographs of Defendant
16 Shorack, without the graphic covering his face, on social media accounts associated with
17 Shorack. I interpreted this text message and photos to be “Ike” trying to encourage his
18 victims to recruit other victims to work for him by portraying him as a successful pimp.

19 28. On October 24, 2021, Ike sent another message encouraging his victims to
20 find someone vulnerable to exploitation to work for him:

21 Snap, Instagram, old phone number...

22 Who can we knock? Whos broke?

23 Who’s down bad, or has willing potential to be a hoe . . .

24 Y’all can’t tell me in this whole world . . . that none of any of the people we
25 know aren’t good candidates.

26 We gotta search deep, and see who we can knock. We don’t sell a dream &
27 we don’t lie. We just keep it real & tell them the truth & the benefits we
28 have experienced ourselves.

1 Ike then gave his victims a script to follow if someone was interested and wanted to know
2 more about pimping for him.

3 The question “sooo what is it like?”

4 “So what should I know about it?

5 Here’s a template to answer:

6 So Aurora is what we call the blade, It’s in North Seattle. It’s a coo little
7 road where there’s hella traffic and motels.

8 Hella hoes be out there making crazy good money.

9 A hoe mentality is a girl that don’t want to work a 9-5, wants Financial
10 freedom. With the ability to live in a nice spot, drive nice cars! And best of
11 all travel.

12 Essentially how it starts, is you choose up. Choosing up is when you
13 choose a Pimp.

14 Many girls ask why you need a pimp . . .

15 They get bad rep from society. . . but a P is a necessity in this game, & to
16 put you on game, teach you the ins and outs of how to get your money up,
17 & protection.

18 We have one of the best and most well known P’s not just in Seattle. But
19 all over.

20 He’s a young real estate agent who really who really believes in this
21 lifestyle.

22 A p job is motivate and elevate the girls he works with. Ike has 5 & is
23 growing rapidly.

24 Essentially if you started working, you would work with me and some of
25 the other girls. We would ease you into it & teach you

26 Everyone got there own thought on it, but those that commit to the game
27 run up a check!

28 But I make what I made off 40 hour weeks in 1 day.

I make like 2k a day. Sounded scary at first but it’s a crazy fun lifestyle.

29. During the review of the photos of L.P.’s phone, I observed numerous
sexually explicit photographs. Although most of the photographs did not include the
faces of the person in them, at least one did and I confirmed it was L.P. That picture also
included L.P.s name on it.

25 C. Identification of “Ike” as Defendant Isaac Shorack

30. Public source information for the number associated with “Ike” (206-696-
4026) showed it was associated with Defendant Isaac Shorack. As noted above,

1 Shorack's name and signature was on the liability waiver for Long Beach Horse Rides,
2 Inc., indicating that he had been at the ranch the same day as L.P., M.L., and T.M. Upon
3 learning this information, SA Hippe and I obtained Shorack's driver license information
4 and photograph, vehicle registration, and criminal history, which included an arrest on
5 June 10, 2021, by the Seattle Police Department (SPD) for promoting prostitution. On
6 January 18, 2022, I obtained the SPD reports pertaining to the arrest and saw that
7 Shorack's phone number was in the report as 206-696-4026, which is the same number
8 associated with the name "Ike" in T.M.'s phone. When reviewing Shorack's criminal
9 history check, I observed that Shorack was a denied firearm applicant. The denial
10 included that Shorack had applied for the purchase or transfer of a firearm and was
11 denied as the result of a background check that indicated the applicant was ineligible to
12 possess a firearm under state or federal law. An "attempt" date of June 21, 2021 was
13 included, which was shortly after being arrested by SPD for promoting prostitution.

14 31. While reviewing the group chat described above, I observed the following
15 evidence that further indicated that Defendant Isaac Shorack was the individual using
16 phone number 206-696-4026 and identified in T.M.'s phone as "Ike":

17 • On September 11, 2021, Ike/206-696-4026 sent the group chat a screen
18 capture of a reservation for "Isaac Shorack" on Alaska flight 1017 from Minneapolis to
19 Seattle, along with the message "See y'all at 10:06 tomorrow," which was the scheduled
20 arrival time for the flight.

21 • On September 12, 2021, Ike/206-696-4026 messaged a picture of a black
22 Dodge Charger, Daytona edition, with yellow trim on the front bumper, captioned
23 "Daddy's new whip." I know through training and experience that "Daddy" is a term
24 used in the pimping and prostitution culture to refer to a pimp and sex trafficking victims
25 often refer to their pimps as Daddy. Based upon a sign that was partially visible, the
26 picture appeared to have been taken at a Jeep Ram dealership. I observed the businesses
27 Gerber Collision & Glass and Indo Café across the street from the dealership in the
28 photograph. I searched online and located Chrysler Dodge Jeep Ram of Seattle, with the
address 13733 Aurora Avenue North in Seattle. Across Aurora Avenue are the
businesses Indo Café and Gerber Collision & Glass.

1 • On September 13, 2021, Ike/206-696-4026 messaged, “Good luck looking
2 for a white jeep.” I am aware from SPD police records that Shorack was contacted in a
3 white Jeep when he was arrested in June 2021 for attempting to recruit an undercover
4 police officer to prostitute.

5 • On September 17, 2021, Ike/206-696-4026 sent a message to the group chat
6 stating that the victims could show reviews from his clients to anyone who claimed he
7 (Ike) did not actually sell real estate. He sent two screen captures of what appears to be an
8 Instagram account “shorack_properties” that included several reviews addressed to Isaac.
9 “Isaac Shorack” appears under the profile picture, along with “Seattle Real Estate Agent
@sothebyrealty.” I compared the profile picture with Shorack’s DMV photograph, and
they appear to be the same person.

10 • On October 8, 2021, Ike/206-696-4026 messaged the group a screen shot of
11 an Amazon order along with the message, “Hand, feet & toe warmers en route.” The
12 order showed that the items were being shipped to Isaac Shorack at an address in North
13 Seattle.

14 • On October 12, 2021, Ike/206-696-4026 messaged: “These P’s could never
15 actually have a car in their name! With the registration in the glove compartment,” along
16 with a picture of the front of a black car with yellow trim that appears to be the above-
17 described Dodge Charger. The license plate is blurry, but appears to read CAP0196. I
18 am aware through Washington State Department of Licensing records that Shorack is the
19 registered owner of a 2021 Dodge Charger with license plate CAP0196. The title of the
Dodge Charger was transferred to Shorack on October 13, 2021.

20 • On October 19, 2021, Ike/206-696-4026 messaged the group a picture of
21 the back of a Bank of America card, number ending in 6635, in the name of “ISAAC K
22 SHORACK.” The messaged included, “For today. Put this in your phones for Uber.
23 Remove the other ones you might have. Ask [T.M.] if you need help.” [T.M.] replied
24 with a screen shot that showed she tried to use the card for Uber and received the
25 following response: “This payment method is being used by too many Uber accounts.
26 Please add a different one to continue.” Ike/206-696-4026 replied to use a different card
27 instead, sending a picture of the back of a different Bank of America card, number ending
28 in 1773, in the name of “ISAAC K SHORACK.” Ike/206-696-4026 messaged,
“Everyone use this one, if there was ever a day to try your best to not Uber. Today is the
day. And please text me before you request and Uber for every Uber today, so I can
monitor it.”

1 • On October 23, 2021, Ike/206-696-4026 messaged a screen capture
2 showing negative COVID test results for “Isaac Kirabo Shorack, DOB XX/XX/1999.”

3
4 **D. Shorack’s Collection and Handling of the Proceeds of His Victim’s
Commercial Sex Acts**

5 32. SA Hippe subsequently served legal process on Bank of America and
6 learned that two accounts were associated with Shorack: an account in the name of Isaac
7 K. Shorack ending in 7185 (hereinafter “Account 7185”) and an account in the name of
8 Isaac K. Shorack ending in 0612 (hereinafter “Account 0612”). Shorack is the sole
9 signer for both accounts.

10 33. I reviewed the bank statements for these accounts during the time period of
11 the group chat. In the group chat, Shorack often gave a daily total for how much the girls
12 earned through commercial sex, sometimes praising them and sometimes disappointed by
13 their efforts. I reviewed the bank statements and observed ATM deposits coinciding with
14 the messages, including the following examples:

- 15 • On September 12, 2021, Shorack messaged the number “5,700” to the group
16 chat and stated that he was proud of everyone, that “Last night was the team
17 I’ve dreamed of and worked so hard to build” and “Patience, consistency, &
18 loyalty are what pays off in this game.” On the same day Shorack sent this
19 text, \$5,710 was deposited into Account 7185 via ATM at a Bank of America
20 branch identified in the records as “AURORA NORTH SHORELINE WA,”
(hereinafter “the Aurora ATM”).
- 21 • On September 19, 2021, Shorack messaged: “6,275 ON A SLOW NIGHT.”
22 Bank records show that on the same day, \$6,275 was deposited at the Aurora
ATM into Account 7185.
- 23 • On September 21, 2021, at 1:56 a.m., Shorack messaged “3,600.” Bank
24 records show that on that same day, \$3,608 was deposited at the Aurora ATM
25 into Account 7185.
- 26 • On September 24, 2021, Shorack messaged “Please have trap ready” and “Be
27 there in 3 mins.” He then messaged a photo of a Bank of America deposit in
28

the amount of \$6,335. Bank records show that on that same day, \$6,335 was deposited at the Aurora ATM into Account 7185.

- On October 1, 2021, Shorack messaged “Good job working the blade tonight ladies. 7,800 on a Thursday is insane.” Bank records show that on that same day, \$7,854 was deposited at the Aurora ATM into Account 7185.
- On October 3, 2021, Shorack messaged to get the “trap” ready and that he had just pulled in. He then messaged “9075 as a team! Fantastic job ladies.” Bank records show that on October 4, 2021, \$9,075 was deposited at the Aurora ATM into Account 7185.
- On October 5, 2021, at 1:31 a.m., Shorack messaged “6,300 on a Monday.” Bank records show that on October 6, 2021, \$5,620 was deposited at the Aurora ATM into Account 7185.
- On October 13, 2021, Shorack messaged a picture of a Bank of America deposit in the amount of \$1,240. He then sent a message indicating that he was not happy with this amount, stating “We giving it our best effort? Or we just half assing it.” Bank records show that on that same date, \$1,240 was deposited at a Bank of America ATM identified as “LAKE CITY SEATTLE WA” (hereinafter “the Lake City ATM”) into Account 7185.
- On October 20, 2021, Shorack messaged a picture of a Bank of America deposit in the amount of \$4,461. Bank records show that later that same day, \$4,461 was deposited at the Aurora ATM into Account 7185.

E. December 17, 2021 Law Enforcement Contact With T.M.

34. On December 17, 2021 T.M. was contacted in a prostitution sting by the Seattle Police Department (SPD). SA Hippe responded to SPD and interviewed T.M.

35. T.M. related that she was working as a sex worker because it was making her better money than jobs she had previously worked at McDonalds and other service industry locations. She stated that her primary goal was to be able to care for herself and live independently from her mother, who has significant drug abuse and financial problems. She related that her father has been in and out of the prison system and she avoids contact with him as well as her sister. T.M. stated that she and her friend L.P. have

1 | been working as sex workers on Aurora Avenue for the last couple of months. She
2 | initially stated that she had been friends with L.P. for a long time, but later stated that she
3 | had met L.P. "on the track" only a few months ago and that they had banded together
4 | after they both realized they were minors. T.M. stated that she kept all the money she
5 | earned and was working independently. She stated that multiple pimps had tried to recruit
6 | her since she started working on Aurora Avenue, but she has stayed independent the
7 | entire time she has been working as a sex worker. T.M. stated that due to a bad
8 | hematoma she had in the past, sex had become meaningless as she had lost the ability to
9 | feel any pleasure from it. She also related that she had not had any bad experiences with
10 | pimps or sex buyers while working as a sex worker, but did state that a male about 5' 11"
11 | driving a blue Hyundai Elantra with tinted windows and a license plate beginning with B
12 | had harassed and behaved erratically with girls working on Aurora Avenue.

13 | 36. T.M. stated that she would stay with friends, primarily in Kent, but also in
14 | West Seattle. She said that she would travel from Kent or West Seattle each day up to
15 | Aurora Avenue and travel back when she was done for the night. She stated that she did
16 | not stay on or around Aurora Avenue or have her own place. T.M. stated that she makes
17 | an effort to stay out of her friend in Kent's home, as the friend has a one-year-old child
18 | and T.M. does not want to burden them. T.M. stated that the child was named
19 | Montgomery but would not state her friend's name.

20 | **F. Identification of Shorack's Instagram Account**

21 | 37. On January 27, 2022, I located the Instagram Account "isaacshorack." I
22 | recognized Shorack in the profile pictures as well as additional pictures posted to the
23 | account. The profile included the locations Seattle and San Diego and Shorack was listed
24 | as a Real Estate Agent with @sothebysrealty. I searched Shorack's followers and
25 | observed the accounts "trinity.main" and "hosedrvinufos," two of the SUBJECT
26 | ACCOUNTS. The "trinity.main" account is associated with T.M. and I recognized T.M.
27 | in pictures posted to the account. The "hosedrvinufos" account is associated with L.P.
28 | and I recognize a picture of L.P. posted on the account. I observed "hosedrvinufos" was

1 following the account “iketurnher,” SUBJECT ACCOUNT. The profile picture of the
2 “iketurnher” account appeared to be a black male in a blue suit, but the male’s face was
3 not visible. However, the suit and tie appeared to be the same as from the “isaacshorack”
4 account.

5 **G. Introduction of Fictitious Persona “Niki”**

6 38. On January 28, 2022, I informed FBI Task Force Officer (TFO) Craig
7 Tangemen of the Denver, Colorado Field Office that I was currently investigating a child
8 sex trafficker who was suspected of pimping multiple girls in the Seattle area.

9 39. Through training and experience, TFO Tangeman has learned that subjects
10 who traffic and exploit others for the purpose of sexual servitude commonly use social
11 media platforms on the internet to recruit and sexually exploit their victims. One of those
12 platforms is Instagram, a publicly accessible communications and social media website.
13 In an effort to combat the recruitment of women and children for the purpose of sexual
14 exploitation via the Instagram platform, TFO Tangeman previously created the fictitious
15 undercover (UC) persona “Niki” on Instagram (Niki303g). When TFO Tangeman
16 created the fictitious profile, he used several different photographs that he had received
17 from a paid FBI female Confidential Human Source (CHS). The photographs that were
18 provided by the CHS were for the purpose of investigating sex buying and sex
19 trafficking. The CHS does not have any knowledge of this investigation. The
20 undercover Instagram account does not show what Niki’s age is and is not visible to other
21 Instagram users. TFO Tangeman sent all of the Instagram messages and text messages
22 described below from within the State and District of Colorado.

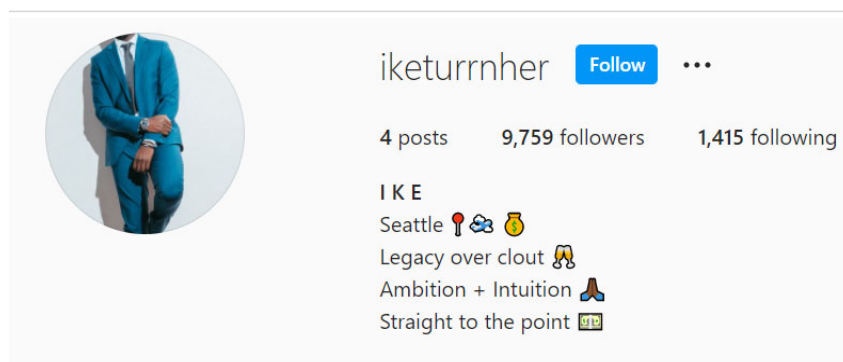
23 40. On January 28, 2022, I advised TFO Tangeman that the subject’s name was
24 Isaac Shorack, and that evidence obtained from the forensic review of L.P. and T.M.’s
25 phone indicated that he was trafficking minors and attempting to recruit other victims
26 into a life of prostitution where he would act as their pimp and take their earnings. I also
27 advised TFO Tangeman that Aurora Avenue is an area commonly referred to as “the
28 blade” that is known for prostitution. I told TFO Tangeman that Shorack is active on

1 Instagram and that his account was under “iketurnher,” SUBJECT ACCOUNT. I further
 2 advised that Shorack was the confirmed user of 206-696-4026, as described above. I
 3 requested TFO Tangeman’s assistance with investigating Shorack’s potential online
 4 recruitment activities.

5 41. On January 28, 2022, while acting in a covert capacity as Niki, TFO
 6 Tangeman used the “Niki303g” Instagram account to locate the “iketurnher” Instagram
 7 account. The “iketurnher” Instagram account was private so TFO Tangeman requested
 8 permission to follow this user by clicking the “follow” button.

9 42. On January 29, 2022, TFO Tangeman noticed that his request to follow
 10 “iketurnher” was approved, at which point they were both following each other’s
 11 accounts and communicating via the Instagram application. Instagram is a social
 12 networking site that is typically accessed via the Instagram application once it is
 13 downloaded to a device capable of communicate via the internet. Once the application is
 14 downloaded, the Instagram application allows its user to share images, post reels, and
 15 communicate via a message and video platform.

16 43. After the user of “iketurnher” allowed TFO Tangeman to follow his
 17 Instagram account, TFO Tangeman viewed the images, posts, and reels that the user had
 18 uploaded to the account. The profile picture was of a black male wearing a blue suit. On
 19 the profile page it indicated the user’s name was “Ike” and contained the following
 20 information:



27 There were six images uploaded to the “iketurnher” Instagram account. All six images
 28 depict the same black male posing in the pictures. Three of the images depict him in

1 front of higher end vehicles and one of the images shows him fanning out money. There
2 were also two video reels uploaded to the account. One depicted the same black male at
3 a barbershop and the second depicted an unidentified person driving a Lamborghini with
4 a banner across it that stated "back home." The black male was not seen in the reel
5 depicting the Lamborghini.

6 44. I forwarded TFO Tangeman a copy of Shorack's Washington driver's
7 license and his photograph. After comparing the driver's license photograph of Shorack
8 to the images of the male that were uploaded to the "Iketurnher" Instagram account,
9 TFO Tangeman concluded that Shorack was the man pictured in the Instagram images.
10 The images of Shorack that were uploaded to the "iketurnher" Instagram account were
11 done in a manner that suggested Shorack was the user of the account. Based on the
12 information provided by me to TFO Tangeman, and the images of Shorack that were
13 uploaded to the "iketurnher" Instagram account, "ike" and the user of the "iketurnher"
14 Instagram account will be hereinafter referred to as Shorack.

15 45. On January, 29, 2022, TFO Tangeman, posing as "Niki," initiated
16 communication with Shorack by sending him the following message through the
17 Instagram messaging platform: "Ever been to Denver. I feel like we've met b4."
18 Shorack replied "Haven't been." TFO Tangeman responded "oh . . . my bad." Shorack
19 then asked if TFO Tangeman had ever been to Seattle. TFO Tangeman told him that he
20 had not, but that he had heard it was pretty "dope" in Seattle. Shorack replied, "Yah you
21 should come check it out. I'd love to take you to dinner." TFO Tangeman replied that if
22 he was in Seattle, he would be down with that. Shorack asked, "how do we get you
23 here?" TFO Tangeman replied that he didn't know but that would be "fire." Shorack
24 stated "Let's get you in a flight" and then asked "You a 304"? Both TFO Tangeman and
25 I are aware from training and experience that the term "304" is used in the
26 pimping/prostitution culture to mean "hoe," since 304 turned upside down it spells, or is
27 intended to mean, "hoe." In the pimping and prostitution culture, the word "hoe" is used
28 as a derogatory term for a commercial sex worker.

1 46. TFO Tangeman replied to this message by asking, “304?” TFO Tangeman
 2 then sent Shorack the following message: “Oh . . . I just figured that out lol. I’ve been
 3 called worse . . .” Shorack replied by saying he was confused and that “Its not a bad
 4 thing.” TFO Tangeman told Shorack that he didn’t have anything going on in Denver
 5 and asked what it was like out there (Seattle). Shorack replied: “Seattle is incredible.
 6 One of the best blades in the country. Cops don’t bother no one; and if you fuck with the
 7 right dude! You can really elevate.” TFO Tangeman replied: “like you. Lol. I wouldn’t
 8 know where to star doin that out there... never been there.”

9 47. TFO Tangeman and I are aware through training and experience that the
 10 word “blade” in the pimping and prostitution culture refers to an open-air commercial sex
 11 location, typically where commercial sex workers walk the streets to make contact with
 12 sex buyers. TFO Tangeman and I also know from training and experience that when sex
 13 traffickers recruit victims through social media they often use the word “elevate” as a
 14 coercive technique to make the victims they are recruiting believe they can do better in
 15 life, or “elevate,” if they work with them. Shorack replied on January 30, 2022, at 12:30
 16 a.m.: “Haha text me 206-696-4026.”

17 48. In response to this message, on January 30, TFO Tangeman switched from
 18 messaging with Shorack on the Instagram platform to texting with him at 206-696-4026.
 19 The undercover phone number TFO Tangeman used to communicate with Shorack was
 20 720-310-3884. Posing as “Niki,” TFO Tangeman sent Shorack a text that stated “Hey its
 21 Niki from IG.” After exchanging pleasantries, Shorack asked if TFO Tangeman lived in
 22 Colorado. TFO Tangeman replied by telling him, “Yep . . . I do now.” Shorack told
 23 TFO Tangeman his Instagram account looked like a spam account and then asked if TFO
 24 Tangeman was a real person. TFO Tangeman replied in the affirmative and then asked if
 25 Shorack was real. Shorack replied “I am! Haha. Just Checking. Because I’m tryna put
 26 you on game.”

27 49. TFO Tangeman and I know from training and experience that in the
 28 pimping and prostitution culture the word “game” is a reference to pimping and

1 prostitution. TFO Tangeman replied by asking what exactly that meant and sent him an
2 emoji depicting money with a question mark. Shorack replied, "Yeah." TFO Tangeman
3 replied by telling Shorack, "Well im interested I aimt got shit goin for me here. So???"
4 Shorack then asked, "You wana fly out here & have conversation over brunch?" TFO
5 Tangeman asked, "For real?" Shorack stated, "Yuh" (positive for yes).

6 50. On January 30, 2022, at 1408 hours, TFO Tangeman had a Confidential
7 Human Source (CHS) make a recorded call to Shorack at 206-696-4026. The CHS did
8 not have any knowledge of this investigation prior to making the call and was provided
9 with very basic information just so she could speak with Shorack in more detail about
10 what his intentions might be. All the calls made between the CHS and Shorack were
11 recorded and monitored by TFO Tangeman live.

12 51. After several voice mails, text messages, and missed calls, Shorack called
13 the CHS in the early afternoon of January 30, 2022. The call was recorded and
14 monitored by TFO Tangeman in real time. After exchanging pleasantries, Shorack
15 asked the CHS how she found his Instagram account. The CHS replied she was looking
16 for her friend Ike and happened upon his page. Shorack said he would love to meet the
17 CHS and understood the CHS did not have much going on in Colorado. Shorack told the
18 CHS there was a lot of opportunity in Seattle from a business standpoint, stating that
19 Seattle is the home to many major corporations. Shorack then clarified that he is not into
20 "that" aspect of things (referring to big corporations), but that Seattle as a city has a lot to
21 offer. Shorack told the CHS he would love to learn more about her and would love to tell
22 her about what he does and how he has been able to help certain people make lots of
23 money. The CHS replied she would love to learn from him and that she did not have
24 much going on in Colorado.

25 52. The CHS told Shorack she was from California and was staying with
26 friends right now because her mother was in jail. Shorack asked how old the CHS was
27 and she replied "I'm seventeen." Shorack replied "okay," "right on, right on." The CHS
28 stated she turned eighteen "pretty soon." When Shorack asked "what's pretty soon?"

1 The CHS replied “eleven months.” Shorack laughed and said the CHS just had a
2 birthday. Shorack asked if the CHS had her “ID” (referring to identification) and asked if
3 she would be able to fly. The CHS replied she has an identification as well as a few fake
4 identifications. Shorack replied “Oh wow” and “that’s what’s up.”

5 53. When Shorack asked what brought the CHS to Colorado, she replied that
6 she had moved there to live with her uncle after her mother went to jail. When she
7 arrived in Colorado, however, he and his wife were having problems and it was awkward
8 to live with them. The CHS stated that she had friends as well as an on again/off again
9 boyfriend, but that he was not a very good person. Shorack replied that was usually how
10 it went with on again/off again boyfriends.

11 54. Shorack then explained that he had to protect himself and was not going to
12 tell the CHS everything about him. He said that he was trying to be smart because he
13 doesn’t know the CHS and she could be anyone. Shorack stated that at same time, the
14 CHS has a lot of what he is looking for and that he thinks Shorack has a lot of what the
15 CHS is looking for. Shorack stated it would be a leap of faith on both their ends, as well
16 as a big financial investment for him, if he bought her a plane ticket to Seattle. Shorack
17 advised that he “didn’t expect anything back” with regards to paying for the plane ticket,
18 since he makes plenty of money and the price of the ticket “is nothing.” Shorack then
19 asked “hypothetically” what the CHS would think if he wanted to fly her to Seattle in the
20 next few days. The CHS replied that while she doesn’t have anything going on in
21 Colorado, she would want to make sure she was safe because she does not know Shorack.
22 Shorack responded that he had asked her a trick question and that her answer was exactly
23 what he wanted to hear. Shorack said that he would have been more hesitant if the CHS
24 wanted to book the ticket right away and that her answer told him that she is smart and is
25 a real person. Shorack listed some safety precautions he could take to make her feel
26 more comfortable, and stated that in person he is a lot more fun and outspoken and “I get
27 money out here.”
28

1 55. The CHS replied that she was “down,” but wanted to know about safety
2 and precautionary stuff, including who would pick her up and where she would be
3 staying. Shorack replied that either he would pick her up at the airport or he would send
4 an Uber, whatever made her more comfortable. He also said that he could put her up at
5 the Hyatt Regency downtown. Shorack said that he had a few girls out “here” (Seattle)
6 and that he could send her their information so they could learn about him from a
7 female’s standpoint. Shorack stated he was not rushing this, but the CHS said she didn’t
8 have anything going on in Colorado, and the sooner he could get her out here the better.

9 56. The CHS asked whether she would get a job once she got to Seattle.
10 Shorack replied that it was up to the CHS, and that he wanted to get her to Seattle so he
11 could meet her in person and talk about what he sees her doing. When CHS asked what
12 kind of opportunities he was talking about, Shorack responded that he has all type of
13 opportunities and said that he is connected to strip clubs and businesses, as well as drug
14 dealers and gang bangers, and that he is also a real estate agent and is connected to real
15 estate companies. Shorack told the CHS that after the call he was going to give the
16 CHS’s Instagram to a few girls that he knows so the CHS could talk to them about their
17 experiences. From there, the CHS could decide whether or not she was interested.

18 57. When the CHS asked what kind of money she could make, Shorack
19 chuckled and replied that “the ones that fuck with me” make anywhere from a “band to
20 two bands” a day, and that he netted about \$90,000 per month. I am aware through my
21 training and experience that “band” is a slang/street term for \$1,000. Shorack also said
22 that he was driving a Lamborghini while he was talking to the CHS. Shorack stated that
23 for his “protection” he was going to have one of his girls talk to the CHS about what they
24 do because it would be a little better and less suspect, and that he was protecting himself
25 and protecting the CHS. Shorack told the CHS that he had thought she was a cop at first,
26 but that after talking to her he realized she was a city girl.

27 58. Shorack said that he was going to have his girl “Snow” follow the CHS on
28 Instagram, and that the CHS should message Snow. Shorack told the CHS that last

1 Saturday, he had “blindly” flown a girl from Oakland to Seattle to be a part of what he is
2 doing. He said that this girl is very happy and that “seven of us” were going to be going
3 to a fancy steak restaurant tonight – two new girls and four who have been around a long
4 time. Shorack said that in addition to “Snow,” L.P., T.M., and M.L. might connect with
5 her via Instagram as well.

6 59. After the call, TFO Tangeman checked the Niki303g IG account and
7 noticed that she had new follow requests from the following five Instagram accounts
8 (SUBJECT ACCOUNTS):

- 9 • “liltrapstar_snow”
- 10 • “luh.mama.02”
- 11 • “trinity.main”
- 12 • “hoesdrivinufos”
- 13 • “allison_mae_92”

14 60. TFO Tangeman then messaged Shorack and asked if “Snow” was the only
15 one of his girls who had asked to follow her, since she had a few other new Instagram
16 follow requests. Shorack replied “Nah that’s all of them;).” TFO Tangeman then viewed
17 the images and video clips of Snow that were uploaded to the “liltrapstar_snow” (Snow)
18 IG account. The images and video clips were of a white female. In one of the images
19 Snow is posing in underwear for the picture. The “liltrapstar_snow” account indicated
20 she was being followed by several IG users to include “iketurnrher” and the account with
21 the same name as T.M.

22 61. On January 30, 2022 at 1446 hours, “Snow” sent a message to “Niki” from
23 the “liltrapstar_snow” Instagram Account that stated, “You pretty!” TFO Tangeman
24 replied by saying “Snow” was gorgeous and that he didn’t know if he was good enough
25 for this. Snow replied by asking, “This?” TFO Tangeman replied, “Uhm . . well I had an
26 idea but he told me to talk to you and u would explain.” Snow then asked, “You ever
27 heard of the term 304.” TFO Tangeman replied, “Lol hoe rt?” (meaning: “laughing out
28 loud hoe right?”). Snow replied:

1 Haha yuh. 304 is a girl that walks the blade, Blade is a street called auroa
 2 where 304's aka hoes. Lol sell 🍷 [an emoji that I am aware is often used
 3 in the pimping/prostitution culture to refer to sex acts that result in
 4 orgasm] 🍑 [an emoji that I am aware is often used in the
 5 pimping/prostitution culture to refer to anal sex]. Everyone got there own
 6 thoughts on it, but those that commit to the game run up a check! (eye and
 7 money emojis). I used to dance, but I gave it up because the money better.
 8 I make 2k a day. Sounded scary at first but it's a crazy fun lifestyle.
 9 Travel, drive nice cars, have anything I want. Work on my own time type
 10 shit. You can also post adds on the net and do escort type shit (followed
 11 by the "100" emoji)."

12 So Auroa is what we call the blade. It's in North Seattle. It's a coo little
 13 road where there's hella traffic and motels. A hoe mentality is a girl that
 14 don't want to work a 9-5, wants Financial freedom. With the ability to
 15 live in a nice spot, drive nice cars! And best of all travel."

16 I am aware that language used by "Snow" in the above-described texts is similar to the
 17 recruiting language Shorack had suggested to his victims in the group chat found in
 18 L.P.'s phone.

19 62. TFO Tangeman replied that "I kinda figured that what this was about. I get
 20 hit up all the time in my dm's by pimps. I down but my only concern is being g
 21 safe!!!!!" Is it true you bring in a rack a day cause that's what he was telling." Snow
 22 responded that "We're very safe." Snow then sent five video clips and two images. One
 23 image was of a large amount of cash spread out on a table and the other was of a female's
 24 hand holding keys while inside an apartment. The first four videos showed large
 25 amounts of cash spread out. The fifth video clip was of a higher end white Mercedes that
 26 had an "EBA" Auto Broker plate on the front. A Google search indicated "EBA" stands
 27 for Elliott Bay Auto Brokers, which is located on North Aurora Avenue. The last video
 28 clip was of a black designer YSL (Yves Saint Laurent) purse.

63. Both TFO Tangeman and I are aware from training and experience that
 when pimps recruit victims into a life of prostitution on social media they will often
 display or send the girls they are recruiting images of large amounts of cash, designer
 cloths, and high-end cars as a coercive recruitment tactic. TFO Tangeman also knows

1 from training and experience that pimps will also have other victims that work for them,
 2 sometimes referred to by the pimp as the “bottom bitch,” recruit victims for them on
 3 social media and have them use similar recruitment tactics.

4 64. “Snow” continued to send additional text messages to “Niki” regarding
 5 Shorack and what she would be doing if she came to Seattle, including the following:

6 • “Ike is one of the best on the west coast. We love it so much! And it’s so
 7 fun! And our lives are changing.”

8 • When TFO Tangeman asked whether Shorack beat his girls, Snow replied
 9 “Nah Seattle is great. And Ike to playa for that shit.” TFO Tangeman replied by asking
 10 what Snow meant by “to playa.” Snow replied, “Like he’s a real p. Don’t beat on no
 11 one. Just elevate.”

12 • When TFO Tangeman asked whether it was hard to do “dates” when she
 13 first started, “Snow” replied: “Eh the first 2. Mainly because you nervous. After that it’s
 14 fun! & all your wifeys are fun. Ike super picky too: so the fact he something in you is
 15 pretty special.”

16 • When TFO Tangeman asked whether “Snow” really recommended having
 17 her come to work for Shorack, “Snow” replied: “Girls what! You the perfect story that
 18 this game looks for. We all have fucked up childhoods and stuff. But Ike really put us in
 19 game and changed our lives. You just gotta fly up here and meet the team.”

20 • “Snow” did not immediately answer when TFO Tangeman asked how
 21 much of her prostitution earnings she would get to keep. When prompted again by TFO
 22 Tangeman, “Snow” replied: “It’s hard when we talk about the trap [referring to money],
 23 but I does it in a really good way. But all the girls on his team give him everything at the
 24 end of the night. But he opens up bank accounts for us and gives us a weekly allowance,
 25 that we don’t touch any of that money for. As well as we have a debit card that he let us
 26 use and we get anything and everything that we need.”

27 • When TFO Tangeman asked how many dates she would have to do,
 28 “Snow” replied: “He don’t set a standard. We just stay down with a good attitude! & he
 bring us in at a decent time.”

65. After talking with “Snow,” TFO Tangeman texted Shorack and told him
 that she had talked to “Snow.” Shorack replied: “Hahah she’s dope. She’s been with me

1 the longest. But that's 1 of 7." Based on my training and experience, I interpreted this
2 to mean that "Snow" was one of seven women working in prostitution for Shorack.

3 66. Starting in the early morning hours of January 31, 2022, Shorack continued
4 to send TFO Tangeman text messages about booking a ticket for "Niki" to come to
5 Seattle. At one point during the day, Shorack sent a message stating that he was going to
6 book a flight for the next night and asking for "Niki"'s full name and date of birth. TFO
7 Tangeman responded with the following name and date of birth from the fake
8 identification card: "Nicole Anne Gomez 1/5/2004." When Shorack asked if that was her
9 real birthdate, TFO Tangeman responded that it was her "18 yr old" fake identification
10 and that she also had a fake identification that said she was 22. TFO Tangeman then
11 stated: "My real date of birth is 1/5/2005," which would make "Niki" 17 years and 26
12 days old. This was the third time in the previous two days that TFO Tangeman informed
13 Shorack that "Niki" was seventeen years old.

14 67. Shorack and TFO Tangeman continued to send text messages about "Niki"
15 flying to Seattle throughout the day. TFO Tangeman then made several unsuccessful
16 attempts to call Shorack on the telephone. On January 31, 2022, at approximately 6:51
17 p.m., Shorack called the CHS from 206-696-4026. The call was recorded and monitored
18 by TFO Tangeman.

19 68. Shorack told the CHS that "Snow" had just called him. Shorack went on to
20 say that Snow is in Houston right now and she (Snow) said the CHS would be "fine."
21 Snow is "playing the blade" in Houston by herself, because some of the girls like to
22 travel to other places to make some money. Snow asked Shorack if he wanted her to
23 come back and he told Snow that if she "had good numbers" this weekend, "sure," but if
24 not they (CHS and Snow) can always Facetime or video chat. Shorack said that Snow
25 had a lot of "game" and that both Snow and his other girls would show the CHS how to
26 do things, and that "all" these girls "in the game" are "reflections of me." Shorack stated
27 the other girls want to meet the CHS also.
28

1 69. Shorack told the CHS it was hard to think of the game as “empowering
2 women,” but that how he thinks of it. The CHS stated the way she sees it, people have
3 sex for free, that’s a normal thing. Shorack replied, “exactly” and “why not get paid for
4 it.” The CHS told Shorack she was excited to meet everyone because if everyone has this
5 mindset, she is going to learn a lot and they are going to make so much money. Shorack
6 replied it was going to be good.

7 70. The CHS then asked Shorack if she could come to Seattle on Wednesday
8 instead of Tuesday so that she could keep a commitment with a friend. Shorack replied
9 yes, but noted that he has been in this game long enough to know that whenever things
10 like this transpire and there is a delay, it may not happen. Shorack stated he has seen it
11 with girls who are really good at making you think they’re ready to go, but then they are
12 never ready to go. Shorack told the CHS that he was going to “keep it 100” with her, and
13 if she switched up the date of her flight again, it was going to be on her to come out and
14 show him that she wants to come. Shorack stated he is ready to pay her flight, but he
15 only pays for the people he likes. Shorack stated that normally if a girl wanted to
16 “choose up” and be around him, the girl had to find their own way to him. Shorack stated
17 that if he felt like it is a good thing, he would “invest.” Shorack further said that while he
18 is not “huge,” he is fairly well known on the West Coast. He stated that when girls see
19 lobster dinners, pretty girls, and Lamborghinis they want to be a part of what he has
20 going on. Shorack said that he doesn’t let just anyone be part of his life, and girls who
21 want to do so have to show they have potential. Shorack stated the CHS’s personality on
22 the phone and her story has intrigued him and he wants to see what she can do. The CHS
23 replied, stating she understood it was a once in a lifetime opportunity and she was not
24 going to change things up and they would see each other on Wednesday.

25 71. The CHS asked Shorack how she was supposed to figure out what to
26 charge. When Shorack asked if she was talking about how to talk to “tricks,” the CHS
27 clarified she wanted to know how to charge them. Shorack replied “that’s all good.”
28

1 Shorack then told the CHS that one of his girls, who was working, was calling him and
2 that he would call the CHS back.

3 72. Shorack called the CHS back a short time later. TFO Tangeman monitored
4 and recorded that call. During the call, Shorack apologized to the CHS for hanging up,
5 explaining that he was dealing with some other stuff. Shorack told the CHS he wanted to
6 answer all her questions. With regards to how the CHS would learn how to make the
7 money "on it," Shorack stated "they" (meaning he and his girls) would teach the CHS
8 that. Shorack told the CHS that when she came in, she would be put up at a nice "spot."
9 Shorack stated he and the CHS would "ride the blade" together to get acclimated with
10 each other, and then he would let the CHS hang out with the girls. Shorack stated that
11 they would tell the CHS about doing "hundred dollar dates" here, "two hundred dates
12 here." Shorack stated sometimes the "trick doesn't even want to fuck, he just wants
13 conversation." Shorack told the CHS some of those tricks are the best tricks, because the
14 girls can get like \$500 just to sit in a room and talk to the dude and make him feel good.
15 Shorack told the CHS he could sit on the phone and tell her a lot of that, but they have a
16 "saying in the game" that it's "caught more than it's taught." Shorack told the CHS she
17 just had to get here and be around it and she would understand. Shorack told the CHS
18 she would think it was a piece of cake, then she would "touch the money" and never want
19 to go back home to Colorado.

20 73. The CHS stated that made her feel better and said she was worried about
21 being by herself. Shorack responded that she would not be by herself and that five or six
22 of his girls travel by Uber together every day. Shorack told the CHS he would make sure
23 the CHS was coached and that she would have all the knowledge, as well as all the girls
24 around her. Shorack told the CHS that he intended to partner her with one of his girls.
25 Shorack told the CHS the name of this girl, which was the same first name as L.P.
26 Shorack said that L.P. was excited to meet the CHS, and that L.P. and the CHS would
27 share a room, a room key, and condoms.
28

1 74. The CHS then asked about “anal,” referring to anal sex. The CHS told
2 Shorack that she had never done it, but she was not against it and wanted to learn about it
3 more. Shorack stated that “that,” referring to anal sex, is something that they may or may
4 not get to in the future. Shorack told the CHS that anal was always an option if a trick
5 offered \$500 or \$1,000, but the CHS did not have to worry about that. Shorack stated he
6 has only had one girl do anal, approximately in the last six months. Shorack told the
7 CHS she has the right to tell the trick she does not do anal. Shorack then mimicked a sex
8 buyer, saying that if the CHS declined to do anal sex, the sex buyer would then ask “is
9 your pussy good? . . . boom.” The CHS clarified that she could say “no” to some things
10 (meaning sex acts) and Shorack replied that she could and that “they” want to make sure
11 she is safe, since “That’s how I roll.”

12 75. Shorack said that the CHS is a lot like him and referred to himself as the
13 CHS’s “daddy.” He then clarified that he was not the CHS’s “daddy” yet, but he hoped
14 to be. I am aware from my training and experience that pimps often require their victims
15 to refer to them as “daddy.” Shorack and the CHS then discussed logistics of when he
16 could fly her in. He said that he would book the flight for Tuesday or Wednesday and
17 would send her a screen shot of the boarding pass.

18 **H. Shorack’s Purchase of Flight to Seattle for “Niki” and Arrest**

19 76. The next day, February 1, 2022, Shorack sent TFO Tangeman a text
20 message at 8:38 a.m. saying “good morning!” Shorack and TFO Tangeman continued to
21 text throughout the day. At one point, Shorack sent TFO Tangeman a text stating “I’m
22 flying you out tomorrow morning?” TFO Tangeman replied, “Yay” and asked if it was
23 okay to bring one checked bag with clothes and a carryon. Shorack replied “Yeah that’s
24 perfect. Cute clothes; heels if you have em, make up. Whatever you think you need for a
25 week or 2.”

26 77. Later that day, at approximately 3:28 p.m., TFO Tangeman sent Shorack a
27 text message stating that a friend was willing to take her to the airport but wanted to
28 know what time that would be. Shorack replied that she would need to be there around

1 noon and said that he was “booking now.” After not hearing anything from Shorack for
2 approximately fifty minutes, TFO Tangeman sent Shorack a text asking “Did you book
3 it???” Shorack replied by stating he was sending over the “stuff” now. Shorack then
4 tried to call TFO Tangeman, who did not answer but instead sent him a text that he
5 couldn’t talk at the moment. Shorack then sent a text asking “Denver airport?”

6 78. TFO Tangeman then directed the CHS make a call to Shorack. The call
7 was recorded and monitored in real time. During the call, Shorack said he wanted to
8 confirm that he had booked the flight out of the right airport and asked if it was the
9 Denver airport. The CHS told Shorack that it was “DIA.” Shorack stated he was going
10 to send the CHS a screenshot of her boarding pass in about five minutes and said it would
11 be a later flight. Shorack stated it would be a 2:30 p.m. flight that landed around 4:30
12 p.m., and to call him if he had any questions.

13 79. Later that day, at 8:36 p.m., TFO Tangeman received a MMS message from
14 Shorack that contained an image of an Alaska Airlines boarding pass for Flight 642,
15 departing Denver on February 2, 2022 at 2:55 p.m. and arriving in Seattle later that day at
16 4:49 p.m. The passenger listed on the boarding pass was “Nicole Gomez,” which was the
17 false name that TFO Tangeman had provided to Shorack. He also received a second
18 screenshot of the booking confirmation. The flight confirmation code was ZMGRUK.
19 No purchaser name or account information was visible on this image. After receiving the
20 boarding pass, TFO Tangeman sent Shorack a text that stated, “OMG im so excited I cant
21 wait to see you.” Shorack replied “I’m hella excited.” After TFO Tangeman asked if he
22 was going to let him ride in his “Lambo,” Shorack replied “Of course haha.” Shorack
23 told TFO Tangeman to go to the baggage claim when he arrived.

24 80. Shorack and TFO Tangeman continued to text throughout February 2,
25 2022, the day of the scheduled flight. When TFO Tangeman sent a text message that he
26 was leaving for the airport, Shorack replied:

27 “For sure:)
28 When you get here; I’ll pick you up
Drive around the city; get food.

1 And then put you in a hotel.
2 You'll probably meet the girls tonight
3 And we'll make a game plan for tomorrow.

4 81. TFO Tangeman continued to send Shorack updates of his flight status. In
5 an effort to identify what type of car Shorack would be driving, TFO Shorack asked him
6 if he was meeting "Niki" at the baggage claim or if she needed to look for the "lambo."
7 Shorack replied: "Haha it might be one of my other cars haha but you'll walk out from
8 baggage claim & I'll probs be in my white Cadillac." After TFO Tangeman sent a text
9 advising that he was seated on the plane, Shorack replied "Safe travels! So excited to
10 meet you. Proud of your courage to try something new."

11 82. Prior to this, beginning at approximately 8:00 a.m., law enforcement had
12 established surveillance at a residence in north Seattle and confirmed the presence of a
13 black Dodge Charger with license plate CAP 0196, which was registered to Isaac
14 Shorack. Surveillance was maintained on Shorack throughout the duration of the day.

15 83. At approximately 9:25 a.m., Shorack departed his north Seattle apartment
16 in the Dodge Charger with Washington license plate CAP0196. Shorack drove to the
17 Hotel Nexus near Interstate 5 and Northeast Northgate Way, where he parked for
18 approximately two minutes. Shorack then departed the Hotel Nexus and went to a Bank
19 of America (BOA) drive-through located at 15401 Westminster Way North, Seattle,
20 Washington, which is very near the intersection of Aurora Avenue and North 155th Street.
21 Shorack was in the drive through lane for approximately three minutes. He then drove
22 from BOA to the area of an Enterprise Car Rental at approximately Aurora Avenue and
23 149th Street, where he met a white or Hispanic male driving a black Dodge Challenger.
24 Shorack's Charger and the Challenger departed the area together and drove to a gas
25 station. When they departed the gas station, Shorack appeared to be driving the
26 Challenger, which appeared to have an out-of-state license plate. The Charger and
27 Challenger went back to the Hotel Nexus. Shorack was observed on foot walking in the
28 direction of one of the hotel entrances. Shorack came out of the hotel after approximately

1 three minutes and approached a white Mercedes sedan bearing Washington license plate
2 CBV8804 and appeared to speak to the occupants of the Mercedes. Shorack then went
3 back towards the direction of the hotel entrance, while the Challenger and Mercedes
4 departed the area. Surveillance observed that the white or Hispanic male was driving the
5 Challenger with a female in the front passenger's seat. Two white females were in the
6 Mercedes. Surveillance units followed the Mercedes to the Haller Post Apartments, 1122
7 N. 115th Street, Seattle, Washington, where the two white females were observed entering
8 building B. After approximately twenty minutes, the Charger departed the hotel and
9 went to a parking lot near Aurora Avenue and North 125th Street, parking between
10 Lowe's Home Improvement and Jack in the Box. The Charger was parked in the lot for
11 approximately thirty minutes before it departed and traveled to Cactus South Lake Union,
12 a restaurant on Terry Avenue in Seattle. Shorack exited the driver's seat of the Charger
13 and walked across Terry Avenue out of view. Approximately three minutes later,
14 Shorack returned to the Charger with a brown paper bag in one hand. He entered the
15 driver's seat, departed the area, and drove back to his apartment. At approximately 4:40
16 p.m., surveillance officers observed Shorack getting into the driver's seat of the Dodge
17 Charger and leaving the apartment complex. Surveillance units then followed Shorack as
18 he traveled directly to the Seattle Tacoma International Airport.

19 84. At 6:26 p.m., I informed TFO Tangeman that Flight 642 had landed in
20 Seattle and that the passengers were exiting the plane. TFO Tangeman then sent a text to
21 Shorack letting him know that he had arrived. At 6:29 p.m., Shorack sent a text that he
22 was close but that traffic was horrible. TFO Tangeman asked if Shorack would be in the
23 white Cadillac and he replied in the affirmative.

24 85. At 6:36 p.m., TFO Tangeman directed the CHS to call Shorack. The call
25 was recorded and monitored in real time. During the call, the CHS told Shorack she was
26 headed toward him and confirmed he was going to meet her at baggage claim. Shorack
27 gave the CHS specific instructions on where to go to meet him. He stated that from
28 Alaska Airlines she would be able to walk to the carousel where her bag would come off

1 the plane. Shorack stated there would be sliding glass doors leading out to where the
2 passenger pick up is located and that he should be there in a little bit. He talked about
3 how the traffic was moving a little slow and said he was ten to fifteen minutes away and
4 told her where she could wait for him. Shorack then asked the CHS if she was law
5 enforcement or affiliated with law enforcement. The CHS stated no, and Shorack replied
6 that he just always has to ask because you never know. Shorack stated that "someone"
7 told him to be careful, indicating that he may have talked to another person about Niki.

8 86. The CHS told Shorack that she felt like she need to ask him if he was law
9 enforcement. Shorack stated no and went on to explain to the CHS that there were other
10 things at play that are super dangerous to him if she was law enforcement. Shorack
11 stated he definitely was not law enforcement and was "legit." He stated he had to make
12 sure he was playing it safe for himself. Shorack stated he never had to ask for himself
13 but that he was excited about how she (the CHS) came to Seattle and wanted to make
14 sure he was being extra cautious, which one day the CHS would appreciate.

15 87. On February 2, 2022, at approximately 6:55 p.m., Shorack told "Niki" that
16 he was coming up to baggage claim. TFO Tangeman responded that he was inside by
17 door number ten. Shorack then tried to call "Niki," but the CHS did not answer. Shorack
18 then sent TFO Tangeman a text that stated "Gotcha," in response to "Niki" telling him
19 that she was at door number ten.

20 88. When Shorack arrived at passenger pickup for Alaska flights, he was
21 contacted by a Seattle Port Authority (SPA) marked unit and taken into custody without
22 incident. SPA officers observed Shorack holding a phone and placing it inside the
23 driver's side door. SA Ben Williamson recovered the phone from the door and provided
24 it to SA Butler.

25 89. I informed TFO Tangeman that Shorack's phone had been recovered and
26 requested he make a controlled call to it using the undercover phone that he used to
27 communicate with Shorack on during this investigation. At approximately 7:04 p.m.,
28 TFO Tangeman made a call from his UC phone (720-310-3884) to 206-696-4026. When

1 TFO Tangeman made the call, I observed the phone receiving an incoming call from a
 2 contact identified “Niki,” thus confirming Shorack was in possession of the phone that
 3 was used to recruit “Niki,” whom he believed to be a seventeen-year-old female, to work
 4 for him by engaging in commercial sex acts.

5 90. At approximately 7:05 p.m., TFO Tangmena sent a message that stated
 6 “test” to the “iketurnher” Instagram account from the “niki303g” Instagram account. I
 7 did not observe an incoming banner on the phone. A few minutes later, TFO Tangeman
 8 called the iketurnher Instagram account from the niki303g Instagram account. I
 9 observed that the phone was receiving an Instagram call from “Brooke.” TFO Tangeman
 10 informed me that “Brooke” was the user name associated with the undercover “niki303g”
 11 Instagram account at that time. This confirmed that Shorack was in possession of the
 12 phone that was linked to the iketurnher Instagram account, which was used to recruit
 13 “Niki,” whom he believed to be a seventeen-year-old female, to work for him by
 14 engaging in commercial sex acts.

15 91. SA Hippe and I attempted to interview Shorack who, after being read his
 16 *Miranda* rights, stated that he would like to talk to his lawyer prior to speaking with law
 17 enforcement. The interview ceased and Shorack was transported to the federal detention
 18 center.

19 92. On January 28, 2022, I requested the preservation of the following
 20 SUBJECT ACCOUNTS through Facebook’s Online Law Enforcement Request Portal:

- 21 • “iketurnher”
- 22 • “trinity.main”
- 23 • “hosedrivinufos”

24 On January 30, 2022, I requested the preservation of the following SUBJECT
 25 ACCOUNTS:

- 26 • “luh.mama02”
- 27 • “allison_mae_92”

1 Until recently, legal process for Instagram was addressed to Facebook. Although I
2 preserved the above SUBJECT ACCOUNTS through the Facebook Law Enforcement
3 Request Portal, I received a notification from Facebook that they have updated their name
4 to Meta Platforms, Inc. ("Meta") and legal process for Instagram should be addressed to
5 Meta. Based on my training and experience, once Meta preserves an account, that data is
6 kept by the company, even if the user deletes the account.

7 **BACKGROUND REGARDING INSTAGRAM**

8 93. Instagram is a service owned by Meta. Specifically, Instagram is a free-
9 access social networking service, accessible through its website and its mobile
10 application, that allows subscribers to acquire and use Instagram accounts, like the
11 SUBJECT ACCOUNTS listed in Attachment A, through which users can share
12 messages, multimedia, and other information with other Instagram users and the general
13 public.

14 94. Meta collects basic contact and personal identifying information from users
15 during the Instagram registration process. This information, which can later be changed
16 by the user, may include the user's full name, birth date, gender, contact e-mail
17 addresses, physical address (including city, state, and zip code), telephone numbers,
18 credit card or bank account number, and other personal identifiers. Meta keeps records of
19 changes made to this information.

20 95. Meta also collects and retains information about how each user accesses
21 and uses Instagram. This includes information about the Internet Protocol ("IP")
22 addresses used to create and use an account, unique identifiers and other information
23 about devices and web browsers used to access an account, and session times and
24 durations.

25 96. Each Instagram account is identified by a unique username chosen by the
26 user. Users can change their usernames whenever they choose but no two users can have
27 the same usernames at the same time. Instagram users can create multiple accounts and,
28

1 if “added” to the primary account, can switch between the associated accounts on a
2 device without having to repeatedly log-in and log-out.

3 97. Instagram users can also connect their Instagram and Facebook accounts to
4 utilize certain cross-platform features, and multiple Instagram accounts can be connected
5 to a single Facebook account. Instagram accounts can also be connected to certain third-
6 party websites and mobile apps for similar functionality. For example, an Instagram user
7 can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a
8 connected Facebook account, or transfer an image from Instagram to a connected image
9 printing service. Meta maintains records of changed Instagram usernames, associated
10 Instagram accounts, and previous and current connections with accounts on Facebook
11 and third-party websites and mobile apps.

12 98. Instagram users can “follow” other users to receive updates about their
13 posts and to gain access that might otherwise be restricted by privacy settings (for
14 example, users can choose whether their posts are visible to anyone or only to their
15 followers). Users can also “block” other users from viewing their posts and searching for
16 their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain
17 activity and prescreen their comments. Instagram also allows users to create a “close
18 friends list” for targeting certain communications and activities to a subset of followers.

19 99. Users have several ways to search for friends and associates to follow on
20 Instagram, such as by allowing Facebook to access the contact lists on their devices to
21 identify which contacts are Instagram users. Meta retains this contact data unless deleted
22 by the user and periodically syncs with the user’s devices to capture changes and
23 additions. Users can similarly allow Facebook to search an associated Facebook account
24 for friends who are also Instagram users. Users can also manually search for friends or
25 associates.

26 100. Each Instagram user has a profile page where certain content they create
27 and share (“posts”) can be viewed either by the general public or only by the user’s
28

1 followers, depending on privacy settings. Users can customize their profile by adding
2 their name, a photo, a short biography (“Bio”), and a website address.

3 101. One of Instagram’s primary features is the ability to create, edit, share, and
4 interact with photos and short videos. Users can upload photos or videos taken with or
5 stored on their devices, to which they can apply filters and other visual effects, add a
6 caption, enter the usernames of other users (“tag”), or add a location. These appear as
7 posts on the user’s profile. Users can remove posts from their profiles by deleting or
8 archiving them. Archived posts can be reposted because, unlike deleted posts, they
9 remain on Meta’s servers.

10 102. Users can interact with posts by liking them, adding or replying to
11 comments, or sharing them within or outside of Instagram. Users receive notification
12 when they are tagged in a post by its creator or mentioned in a comment (users can
13 “mention” others by adding their username to a comment followed by “@”). An
14 Instagram post created by one user may appear on the profiles or feeds of other users
15 depending on a number of factors, including privacy settings and which users were
16 tagged or mentioned.

17 103. An Instagram “story” is similar to a post but can be viewed by other users
18 for only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and
19 remain on Meta’s servers unless manually deleted. The usernames of those who viewed
20 a story are visible to the story’s creator until 48 hours after the story was posted.

21 104. Instagram allows users to broadcast live video from their profiles. Viewers
22 can like and add comments to the video while it is live, but the video and any user
23 interactions are removed from Instagram upon completion unless the creator chooses to
24 send the video to IGTV, Instagram’s long-form video app.

25 105. Instagram Direct, Instagram’s messaging service, allows users to send
26 private messages to select individuals or groups. These messages may include text,
27 photos, videos, posts, videos, profiles, and other information. Participants to a group
28 conversation can name the group and send invitations to others to join. Instagram users

1 can send individual or group messages with “disappearing” photos or videos that can
2 only be viewed by recipients once or twice, depending on settings. Senders can’t view
3 their disappearing messages after they are sent but do have access to each message’s
4 status, which indicates whether it was delivered, opened, or replayed, and if the recipient
5 took a screenshot. Instagram Direct also enables users to video chat with each other
6 directly or in groups.

7 106. Instagram offers services such as Instagram Checkout and Facebook Pay
8 for users to make purchases, donate money, and conduct other financial transactions
9 within the Instagram platform as well as on Facebook and other associated websites and
10 apps. Instagram collects and retains payment information, billing records, and
11 transactional and other information when these services are utilized.

12 107. Instagram has a search function which allows users to search for accounts
13 by username, user activity by location, and user activity by hashtag. Hashtags, which are
14 topical words or phrases preceded by a hash sign (#), can be added to posts to make them
15 more easily searchable and can be “followed” to generate related updates from Instagram.
16 Meta retains records of a user’s search history and followed hashtags.

17 108. Meta collects and retains location information relating to the use of an
18 Instagram account, including user-entered location tags and location information used by
19 Meta to personalize and target advertisements.

20 109. Meta uses information it gathers from its platforms and other sources about
21 the demographics, interests, actions, and connections of its users to select and personalize
22 ads, offers, and other sponsored content. Meta maintains related records for Instagram
23 users, including information about their perceived ad topic preferences, interactions with
24 ads, and advertising identifiers. This data can provide insights into a user’s identity and
25 activities, and it can also reveal potential sources of additional evidence.

26 110. In some cases, Instagram users may communicate directly with Meta about
27 issues relating to their accounts, such as technical problems, billing inquiries, or
28 complaints from other users. Social networking providers like Meta typically retain

1 records about such communications, including records of contacts between the user and
2 the provider's support services, as well as records of any actions taken by the provider or
3 user as a result of the communications.

4 111. For each Instagram user, Meta collects and retains the content and other
5 records described above, sometimes even after it is changed by the user (including
6 usernames, phone numbers, email addresses, full names, privacy settings, email
7 addresses, and profile bios and links).

8 **KNOWLEDGE REGARDING USE OF INSTAGRAM ACCOUNTS AS**
9 **INSTRUMENTALITIES OF THE CRIME**

10 112. The use of an Instagram account to facilitate sex trafficking and interstate
11 transportation for the purpose of prostitution is not unusual. Through my investigative
12 experience, and based upon training and conversations with other law enforcement
13 officers involved in sex trafficking/prostitution investigations, I am aware that persons
14 involved in prostitution and sex trafficking often use social networking websites,
15 including Instagram, as a tool or instrumentality in committing their criminal activity.
16 Specifically, pimps and sex traffickers often use Instagram to identify potential recruits,
17 to communicate with these recruits via Instagram direct messaging or posts on a victim's
18 "wall," and to keep track of their victims and their whereabouts.

19 113. I am also aware from my training and experience that pimps and sex
20 traffickers will often take pictures of the females working for them and post these
21 pictures on their Instagram account. I am also aware from my training and experience
22 that pimps and sex traffickers will often transport their victims to different cities and
23 states to work as prostitutes. In such situations, pimps and sex traffickers will sometimes
24 post on their Instagram accounts about the locations where they are visiting and how
25 much money they are making at these locations.

26 114. I am also aware from my training and experience that sex traffickers will
27 often use the Internet to identify and recruit potential victims. In my experience,
28

1 traffickers will often utilize social media websites such as Instagram to either identify
2 individuals who might be vulnerable to their coercion and exploitation.

3 115. Two of the SUBJECT ACCOUNTS (“iketurner” and “liltrapstar_snow”) were used during the recruitment of an undercover officer who SHORACK believed was
4 a seventeen-year-old female. The other SUBJECT ACCOUNTS appear associated to
5 victims of Shorack, and friended the undercover officer during the recruitment phase.
6 Shorack represented to the undercover officer that the users were all females working for
7 him. During a review of one of the victim’s cell phone extractions, Shorack encouraged
8 victims to find someone on Instagram for them to recruit into a life of prostitution.
9

10 116. Based upon the information set forth above, I believe that the SUBJECT
11 ACCOUNTS are instrumentalities of Attempted Sex Trafficking of a Minor and
12 Transportation for the Purpose of Prostitution and are permeated with evidence of these
13 crimes. A search of these accounts is needed to identify other potential victims who may
14 have been exploited by Shorack.

15 117. Based upon the information set forth above, I believe that the SUBJECT
16 ACCOUNTS will contains evidence, instrumentalities, contraband, and fruits of the
17 violations of Title 18, United States Code, Section 1591(a)(1) and (b)(1) (Attempted Sex
18 Trafficking of a Minor); Title 18, United States Code Section 2422(b) (Attempted
19 Enticement of a Minor); Title 18, United States Code, Section 2423(a) (Attempted
20 Transportation of a Minor with Intent to Engage in Prostitution); and Title 18, United States
21 Code, Section 2421 (Transportation for the Purpose of Prostitution).

22 **POTENTIAL RELEVANCE OF DATA FROM INSTAGRAM ACCOUNTS**

23 118. In my training and experience, evidence of who was using Instagram and
24 from where, and evidence related to criminal activity of the kind described above, may be
25 found in the files and records described above. This evidence may establish the “who,
26 what, why, when, where, and how” of the criminal conduct under investigation, thus
27 enabling the United States to establish and prove each element or, alternatively, to
28 exclude the innocent from further suspicion.

1 119. For example, the stored communications and files connected to the
2 SUBJECT ACCOUNTS may provide direct evidence of the offenses under investigation.
3 Based on my training and experience, instant messages, emails, voicemails, photos,
4 videos, and documents are often created and used in furtherance of criminal activity,
5 including to communicate and facilitate the offenses under investigation.

6 120. Account activity may also provide relevant insight into the account owner's
7 state of mind as it relates to the offenses under investigation. For example, information
8 on the account may indicate the owner's motive and intent to commit a crime (e.g.,
9 information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting
10 account information in an effort to conceal evidence from law enforcement).

11 121. Stored communications including Instagram direct messages not only may
12 contain communications relating to crimes, but also help identify and locate the
13 participants in those crimes. Group lists and friend lists may help identify co-
14 conspirators. Similarly, photographs and videos may help identify and locate the account
15 holder and any co-conspirators. Search and browsing history can also be extremely
16 useful in identifying those using anonymous online accounts and may also constitute
17 direct evidence of the crime of labor trafficking or money laundering to the extent the
18 browsing history or search history might include searches and browsing history related to
19 worksites or attempts to recruit potential victims or conducting financial transactions with
20 the proceeds of forced labor.

21 122. With respect to this case, I anticipate that the SUBJECT ACCOUNTS may
22 contain photographs that may establish Shorack's involvement in the crimes set forth
23 above, as well as communications between Shorack and co-conspirators and/or victims of
24 his crimes. Therefore, the computers of Meta are likely to contain all the material
25 described above, including stored electronic communications and information concerning
26 subscribers and their use of Instagram, such as account access information, transaction
27 information, and other account information.
28

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

123. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Meta to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

124. Based on the foregoing, there is probable cause to believe that the SUBJECT ACCOUNTS, more particularly described in Attachment A, contain evidence and instrumentalities of the crimes of Title 18, United States Code, Section 1591(a)(1) and (b)(1) (Attempted Sex Trafficking of a Minor); Title 18, United States Code Section 2422(b) (Attempted Enticement of a Minor); Title 18, United States Code, Section 2423(a) (Attempted Transportation of a Minor with Intent to Engage in Prostitution); and Title 18, United States Code, Section 2421 (Transportation for the Purpose of Prostitution), as described in Attachment B.

125. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.


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1 126. The government will execute this warrant by serving the warrant on Meta.
2 Because Meta employees will compile the requested records at a time convenient to
3 them, reasonable cause exists to permit the execution of the requested warrant at any time
4 in the day or night.

5
6 
7 ROBERT SPIVEY
8 Special Agent
9 Federal Bureau of Investigation

10 SUBSCRIBED and SWORN to before me this 17th day of March, 2022.

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12 
13 PAULA L. MCCANDLIS
14 United States Magistrate Judge
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ATTACHMENT A

ACCOUNTS TO BE SEARCHED

This warrant applies to information associated with the following Instagram accounts:

- Account ID Instagram: <https://www.instagram.com/iketurnher>
- Account ID Instagram: <https://www.instagram.com/trinity.main>
- Account ID Instagram: <https://www.instagram.com/hoesdrivinufos>
- Account ID Instagram: <https://www.instagram.com/luh.mama02>
- Account ID Instagram: https://www.instagram.com/allison_mae_92
- Account ID Instagram: https://www.instagram.com/liltrapstar_snow

that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), a company headquartered in Menlo Park, California.

ATTACHMENT B

I. Information to be disclosed by Meta

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each of the SUBJECT ACCOUNTS listed in Attachment A:

a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Instagram passwords, Instagram security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;

b. All activity logs for the account and all other documents showing the user's posts and other Instagram activities from January 1, 2021, to present;

c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them from January 1, 2021, to present, including Exchangeable Image File ("EXIF") data and any other metadata associated with those photos and videos;

d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Instagram user identification numbers; groups and networks of which the user is a member, including the groups' Instagram group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Meta applications, from January 1, 2021, to present;

e. All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string, from January 1, 2021, to present;

f. All other records and contents of communications and messages made or received by the user from January 1, 2021, to present, including all Messenger

1 activity, private messages, chat history, video calling and voice calling history, and
 2 pending “Friend” requests;

3 g. All “check ins” and other location information from January 1, 2020,
 4 to present;

5 h. All IP logs, including all records of the IP addresses that logged into
 6 the account from January 1, 2021, to present;

7 i. All records of the account’s usage of the “Like” feature, including
 8 all Instagram posts and all non-Instagram webpages and content that the user has “liked”
 9 from January 1, 2021, to present;

10 j. All information about the Instagram pages that the account is or was
 11 a “fan” of from January 1, 2021, to present;

12 k. All past and present lists of friends created by the account;

13 l. All records of Instagram searches performed by the account from
 14 January 1, 2020, to present;

15 m. The types of service utilized by the user;

16 n. The length of service (including start date), the types of service
 17 utilized by the user, and the means and source of any payments associated with the
 18 service (including any credit card or bank account number);

19 o. All privacy settings and other account settings, including privacy
 20 settings for individual Instagram posts and activities, and all records showing which
 21 Instagram users have been blocked by the account;

22 p. All records pertaining to communications between Instagram and
 23 any person regarding the user or the user’s Instagram account, including contacts with
 24 support services and records of actions taken.

25 q. A list of any accounts linked to the SUBJECT ACCOUNT by
 26 machine cookie.

27 Meta is hereby ordered to disclose the above information to the government within
 28 **14 DAYS** of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of Title 18, United States Code, Section 1591(a)(1) and (b)(1) (Attempted Sex Trafficking of a Minor); Title 18, United States Code Section 2422(b) (Attempted Enticement of a Minor); Title 18, United States Code, Section 2423(a) (Attempted Transportation of a Minor with Intent to Engage in Prostitution); and Title 18, United States Code, Section 2421 (Transportation for the Purpose of Prostitution) involving Isaac Shorack, including for the SUBJECT ACCOUNTS identified on Attachment A, information pertaining to the following matters:

- a. Evidence that Isaac Shorack or his co-conspirators are involved in prostitution, sex trafficking, drug trafficking; or illegal possession of firearms;
- b. Evidence regarding the proceeds of the enumerated offenses;
- c. IP log evidence, including all records of the IP addresses that logged into the account, and the dates and times such logins occurred, suggesting that Isaac Shorack traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking;
- d. Evidence suggesting that Isaac Shorack or his co-conspirators traveled within or outside the Western District of Washington to conduct prostitution or sex trafficking;
- e. Evidence that Isaac Shorack or his co-conspirators used Instagram to recruit individuals to prostitute for him, or to intimidate or tamper with victims or potential witnesses;
- f. Evidence of the identities of and relationships between co-conspirators;
- g. Evidence of who uses or accesses the subject account or who exercises in any way any dominion or control over SUBJECT ACCOUNTS;
- h. Evidence of who communicated with the SUBJECT ACCOUNTS, including records about their identities and whereabouts.

1 i. Log records, including IP address captures, associated with the specified
2 account;

3 j. Subscriber records associated with the specified accounts, including
4 1) names, email addresses, and screen names; 2) physical addresses; 3) records of session
5 times and durations; 4) length of service (including start date) and types of services
6 utilized; 5) telephone or instrument number or other subscriber number or identity,
7 including any temporarily assigned network address such as internet protocol address,
8 media access card addresses, or any other unique device identifiers recorded by Google in
9 relation to the accounts; 6) account log files (login IP address, account activation IP
10 addresses, and IP address history); 7) detailed billing records/logs; 8) means and source
11 of payment; and 9) lists of all related accounts;

12 k. Records of communications between Meta and any person purporting to be
13 the account holder about issues relating to the SUBJECT ACCOUNTS, such as technical
14 problems, billing inquiries, or complaints from other users about the specified account.
15 This to include records of contacts between the subscriber and the provider's support
16 services, as well as records of any actions taken by the provider or subscriber as a result
17 of the communications.

18 l. Information identifying accounts that are linked or associated with the
19 SUBJECT ACCOUNTS.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Meta Platforms, and my official title is _____. I am a custodian of records for Meta Platforms. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Meta Platforms, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;

b. such records were kept in the ordinary course of a regularly conducted business activity of Meta Platforms; and

c. such records were made by Meta Platforms as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.